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September, 28 2004

Docket No. 03-101-2
Regulatory Analysis and Development, PPD, APHIS,
Station 3C71
4700 River Road Unit 118,
Riverdale, MD 20737-1238.

Dear Sir/Madam,

I am writing in regard to Docket No. 03-101-2, the Animal and Plant Health Inspection Service's (APHIS) intent to prepare an environmental impact statement (EIS) relative to its consideration of a petition received from Monsanto Company and The Scotts Company for a determination of nonregulated status for GE creeping bentgrass. It is critical that APHIS conduct an environmental impact statement on GE creeping bentgrass, as the release of this GE organism has unique potential to negatively impact the natural environment.

I urge APHIS to consider the following points in preparation of its environmental impact statement. Creeping bentgrass is a perennial, wind-pollinated species that has potential to cross-pollinate with 12-14 wild relatives. No other commercialized genetically engineered organism is a perennial species with the potential to cross-pollinate with such a large number of wild relatives.

A recent study conducted by the EPA found evidence of "multiple instances at numerous locations of long-distance viable pollen movement from multiple source fields of GM (genetically modified) creeping bentgrass." Additionally, the study found that the bentgrass had the potential to cross-pollinate with species up to 13 miles away.

If approved for commercial release, genetically engineered bentgrass could be planted on more than 17,000 golf courses and millions of private lawns across the country. No other genetically engineered organism has been planted on small plots of public and private lands spread throughout the country. Up until now, genetically engineered organisms have been limited to farmland. Such wide scale plantings virtually ensure contamination by GE bentgrass.

Thank you for your consideration of the above points in your upcoming environmental impact statement. I appreciate your commitment to conducting an EIS on this new genetically engineered organism that has such potential to negatively impact the natural environment.

Sincerely,

Patricia Leavitt-Pagaling

Patricia Leavitt-Pagaling
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